



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0055988

02-RCA-066

NOV 28 2001

Ms. Laura E. Ruud, Permit Specialist
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

RECEIVED
DEC 18 2001
EDMC

Dear Ms. Ruud:

**REQUEST FOR EXTENSION OF THE 303-K CLOSURE CERTIFICATION SUBMITTAL
DATE/HANFORD FACILITY RCRA PERMIT MODIFICATION NOTIFICATION FORM**

Enclosed is a proposed Class ¹ Modification to the Hanford Facility Resource Conservation and Recovery Act of 1976 (RCRA) Permit Part V, Chapter 14, Condition V.14.B.f. The proposed modification changes the submittal date for the 303-K Storage Facility Closure Certification from November 29, 2001, to August 29, 2002. This modification is being submitted for Ecology approval in accordance with WAC 173-303-830, Appendix I, D.1.b., that identifies changes in closure schedule for any unit as a Class ¹ Modification.

As was discussed with Ecology on October 23, 2001, physical closure activities cannot be completed in time to submit the 303-K Closure Certification to Ecology by November 29, 2001, as was previously agreed. In conjunction with the October 23, 2001, meeting, Ecology observed the 303-K Building that is undergoing demolition in accordance with the Ecology-approved closure plan. To date, the building roof and walls have been removed and all that remains of the structure is the floor slab and foundation. It was explained to Ecology that while the building was being demolished, elevated radiological contamination was found in the soil outside the treatment, storage, and disposal (TSD) unit boundary unrelated to the TSD unit operations.

The demolition contractor, Bechtel Hanford Inc., (BHI) was concerned that if a similar contamination existed under the 303-K slab, radioactive air emissions during slab removal could exceed levels allowed under the Washington State Department of Health (WDOH) approved Notice of Construction (NOC) for the demolition. BHI stopped work prior to slab removal to revise the NOC. The NOC approval by WDOH, although expeditious, consumed several weeks, during which time BHI removed its demolition equipment from the site and notified Fluor Hanford, Inc. (FHI) that it will not be available to complete demolition until after the November closure certification due date. FHI has also since determined that no other qualified contractor could be procured to complete slab removal in time to certify closure by November 29, 2001.

NOV 28 2001

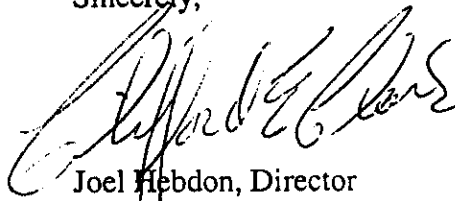
The discovery of radioactive contaminants outside of the TSD unit boundary is a separate issue from the 303K Closure. However, the concern that the radioactive contamination may extend beneath the 303K slab and the fact that a Clean Air Act (CAA) Notice of Construction approval was necessary prior to completing the slab removal directly impacted the 303K closure. As a result, the contractor could not complete the 303-K closure without potentially being in violation of CAA requirements. Additionally the current configuration of the 303-K Storage Facility TSD unit poses minimal risk to human health and the environment since only the concrete slab remains. The Department of Energy is requesting approval of the enclosed Class ¹ change to revised HF RCRA Permit (Dangerous Waste Portion) condition V.14.B.f that currently requires the permittee to submit a certification of closure by November 29, 2001.

Although the unit poses little risk, removal of the 303-K Building concrete slab is planned to be completed by June 30, 2002. Submittal of 303-K Closure Certification will then occur within 60 days of completion of the demolition.

In accordance with Condition I.C.3. of the Hanford Facility RCRA Permit, with your prior approval, this modification will be included in the notification of Class 1 modifications to the Hanford Facility RCRA Permit, DW Portion for quarter ending December 31, 2001.

If you have any questions or need further information, please contact Cliff Clark, of my staff, on (509) 376-9333 or Dave Evans, RL Facility Transition Division, on (509) 373-9278.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:GAW


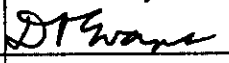
Enclosure

cc w/encl:

G. P. Davis, Ecology
R. Jim, YN
J. H. Richards, CTUIR
P. Sobotta NPT
S. A. Thompson, FHI
M. A. Wilson, Ecology
Administrative Record, H6-08
HF Operating Record, G1-27
Ecology NWP Kennewick Library
Environmental Portal, LMSI

cc w/o encl:

F. W. Bond, Ecology
L. J. Cusack, Ecology
R. H. Gurske, FHI
J. D. Hervey, LMSI
J. L. Jacobson, FHI
S. N. Luke, FHI
J. K. Perry, FHI

Hanford Facility RCRA Permit Modification Notification Form					
Unit: 303-K Storage Facility	Permit Part & Chapter: Part V, Chapter 14 and Attachment 32				
<p><u>Description of Modification:</u></p> <p>Hanford Facility RCRA Permit Condition V.14.B.f:</p> <p>V.14.B.f. Due to lack of federal funding in 1998, the allowed time for closure of 303-K is hereby extended in Accordance with WAC 173-303-610(4)(b)(i) and 173-303-815(3). The Permittees shall submit a Certification of closure for 303-K no later than August 29, 2002 November 29, 2001. In addition, the Permittees shall submit to Ecology at least two (2) reports of progress toward completion of closure (i.e., budgeting for building demolition, obtaining sufficient funding, scheduling the physical work). The first report shall be was submitted no later than by September 30, 1999, and the second shall be was submitted no later than by September 30, 2000.</p>					
Modification Class: ¹²³ Please check one of the Classes:		Class 1	Class ¹ 1	Class 2	Class 3
		X			
Relevant WAC 173-303-830, Appendix I Modification: A.1.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>					
A. General Permit Provisions					
1. Administrative and Informational changes.					
Submitted by Co-Operator:  N. C. Boyter	11.16.01 Date	Reviewed by RL Program Office:  D. T. Evans	11/27/01 Date	Reviewed by Ecology: R. Bond	Date
				Reviewed by Ecology: L.E. Ruud	Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.